



**MODINE**

*Diane Huffman*

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MAR 18 1994

PRMT-SECTION

March 15, 1994

Arthur H. Grover, Chief  
Permits Section  
Missouri Department of Natural Resources  
Division of Environmental Quality  
P.O. Box 176  
Jefferson City, MO 65102-0176

Dear Mr. Grover:

This letter is in response to the MODNR letter dated March 9, 1994 concerning the closure of the Modine Heat Transfer, Inc. storage facility located in Camdenton, MO.

Modine Heat Transfer, Inc. has some reservations regarding the efficiency and environmental effectiveness of excavating the soils from borings B-1, B-2, B-3, B-4, B-7, B-9 and B-11. The levels of constituents of concern, while slightly higher than background levels, are minimal. Several of the organic constituents, including 1,1,1 Trichloroethane, were below the Federal maximum contaminant levels established for drinking water. The presence of organic degradation products also indicates that the natural deterioration of organic compounds is occurring.

Compounds that were never stored on-site in the area are also included in the excavation plan. No lead or lead compounds have ever been stored on-site and have never been put into the storage areas. While Modine is concerned about the elevated level of lead shown by the boring analysis, the background sample also showed an elevated level of lead and seems to be a naturally occurring compound in this area. 1,1,1 Trichloroethane also has never been stored in the areas undergoing closure.

The storage areas are contained and secure. The areas are bounded by a fence and public access is very limited. All contamination is subsurface and further investigation in and around the storage areas has shown that it is local in nature and not migrating. Migration of the compounds of concern is not anticipated due to the local field conditions. The effect on human health and the surrounding environment is anticipated to be nil.

The question of the field blank contamination was addressed in a letter from Law Environmental, Inc. to Mr. Khalid Aljunadi of your office dated March 1, 1994.

Modine Manufacturing Company  
1500 DeKoven Avenue  
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RCRA Records Center

Although Modine will investigate the feasibility of excavation, the preceding arguments show that excavation of this site would be economically and environmentally unwise. Modine would like MODNR to review the excavation requirement for the Camdenton TSDF and reassess the site. Modine also would be willing to meet with MODNR to discuss this matter at MODNR's convenience.

If you have any questions concerning this matter, please contact me at (414) 636-1649 or at the letterhead address.

Sincerely,



Thomas S. Sanicola  
Environmental Engineer

cc: K. Aljunadi - MODNR

R. Stewart, P.E. - EPA Region VII Jefferson City Section

Modine Heat Transfer, Inc. - Camdenton, MO

file (2)

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PRESORTED  
FIRST-CLASS



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